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VIA ECF

Hon. Brian R. Martinotti, U.S.D.J.
United States District Court, District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Plaza, 3rd Floor
Newark, New Jersey 07102

Re: *In re Insulin Pricing Litigation*, Case No. 2:23-md-3080 (BRM/RLS)

Dear Judge Martinotti,

We write on behalf of the State of Louisiana in the above referenced litigation, with member case numbers 23-22978 and 24-07048. The first case names as defendants Sanofi-Aventis US LLC, Novo Nordisk, Inc., CaremarkPCS Health LLC, Express Scripts Administrators LLC, CVS Health Corporation, and OptumRx, Inc. The second case names Eli Lilly as a defendant.

In the first case, the State timely filed its motion to remand on May 22, 2023. Thereafter, this MDL Court administratively terminated the motion to remand. The State also seeks to remand the second case. Ordinarily this deadline would be July 3, 2024, except for the administrative terminations and stayed deadlines in this MDL. In addition, Case Management Order 5 directs that no motions are to be filed without meeting and conferring with the other party on the desired relief.

Counsel for Louisiana have conferred with counsel for Eli Lilly, who confirm that they oppose remand. Accordingly, pursuant to CMO #5, the State of Louisiana submits this letter requesting permission to file their motion to remand at the appropriate time, for which the State will await the Court's determination.

Respectfully submitted,

/s/ John Alden Meade
Counsel for the State of Louisiana